

REMARKS

Original claims 1-66, 68-70, and 70-72 were rejected under 35 U.S.C. 102(e) as being anticipated by *Gai*, U.S. Patent No. 6,167,445. Claims 1, 2, 4, 30, 31, 33, 34, 66-69, and 76-79 are now presented for examination, and Applicants request reconsideration of the rejections in light of both the clarifying amendments to the claims and the remarks set forth below.

Claim 1 and the corresponding dependent claims

Claim 1 is rejected as anticipated by *Gai*. Applicants amend claim 1 herein and submit that the amended claim is distinguishable from *Gai*. Accordingly, applicants request reconsideration.

After amendments, claim 1 recites:

1. A network configuration management system comprising:

a reverse translator configured to receive a first vendor-specific configuration file from a first network device and configured to reverse translate the first vendor-specific configuration file into a plurality of vendor-neutral configlets;

a configuration file generator configured to generate a second vendor-specific configuration file using the plurality of vendor-neutral configlets, the second vendor-specific configuration file corresponding to a second network device; and

a loader for loading the second vendor-specific configuration file to the second network device;

wherein the first vendor-specific configuration file is usable to configure the operation of the first network device and the second vendor-specific configuration file is usable to configure the operation of the second network device.

Gai does not teach or suggest this claimed network configuration management system. For example, *Gai* does not teach or suggest the reverse translator recited in claim 1. *Gai* does disclose a policy translator 410, but this policy translator is not equivalent to applicants' claimed reverse translator. *Gai* discusses its policy translator at column 13, line 61 through column 14, line 23 and at column 17, lines 33-48 according to the Office Action. This *Gai* material indicates that the policy translator is receiving the policy information shown in Figures 6 and 7A-7F. *Gai* also discloses that the policy translator receives this policy data from the repository 326 and not a network device. Column 14, lines 9-12.

Gai's policy translator is different from applicants' claimed reverse translator in several ways. For example, *Gai*'s policy translator never "receive[s] a first vendor-specific configuration file from a first network device." In fact, *Gai*'s policy translator does not receive any information from a network device such as a router or switch. Accordingly, *Gai* cannot receive a vendor-specific configuration file from a network device.

Further, *Gai*'s policy information is not and cannot properly be considered as a "vendor-specific configuration file" that is "usable to configure the operation" of a network device.

Additionally, *Gai*'s policy translator does not "reverse translate the first vendor-specific configuration file into a plurality of vendor-neutral configlets" as is required by claim 1. *Gai*'s policy translator does not appear to translate anything from a vendor-specific arrangement into a vendor-neutral arrangement.

Claim 1 also recites a “configuration file generator configured to generate a second vendor-specific configuration file using the plurality of vendor-neutral configlets, the second vendor-specific configuration file corresponding to a second network device.” *Gai*’s policy translator does not generate a vendor-specific configuration file using the plurality of vendor-neutral configlets.

In conclusion, *Gai* does not teach or suggest the limitations now recited in claim 1. Accordingly, applicants’ respectfully request that the rejection against claim 1 and the corresponding dependent claims be reconsidered.

Claim 66 and the corresponding dependent claims

Claim 66 is rejected as anticipated by *Gai*. Claim 66, however, recites several limitations that *Gai* does not disclose.

66. A method of accessing a configuration setup on a network device, comprising:

maintaining login information for access to the device in the device and in a configuration server;

maintaining, in the server, login information for access from a user to the server and device access rights for the user; and

accessing the configuration setup of the device by a user through the server by the user accessing the server and the server accessing the device.

The Office Action points to column 12, lines 41-67 and column 13 line 63 through column 14, line 23 of *Gai* as support for the anticipation rejection. This *Gai* material discloses a network user table 710 that identifies the type of network quality of service that each employee is permitted. For example, the CEO is granted a high network

quality of service called “CEO BEST EFFORT.” Other users only get “BEST EFFORT” service. In essence, the network user table allocates service levels to particular people.

First, *Gai*’s network user table and service allocation are not related to login information or the step of accessing a configuration setup on a network device as is recited in claim 66. Second, *Gai* does not disclose maintaining login information at both the network device and at the configuration server as claim 66 recites. In fact, the *Gai* material cited by the Office Action does not disclose maintaining login information at any location.

Again, *Gai*’s network user table 710 is not the same as the login information recited in claim 66. And even if *Gai*’s network user table did include login information—which it does not—that information is not and could not be maintained at both the network device and at the configuration server as claim 66 requires.

Accordingly, claim 66 is not anticipated by *Gai*.

Claim 78 and the corresponding dependent claims

Claim 78 and 79 are added. Claim 78 recites:

78. A network configuration management system comprising:

a reverse-translator configured to receive a first vendor-specific configuration file from a first network device and configured to reverse translate the first vendor-specific configuration file into at least one vendor-neutral configlet; and

policy engine including a verification clause, the policy engine configured to verify the at least one vendor-neutral configlet against the verification clause.

As previously discussed, *Gai* does not disclose a reverse translator. Additionally, *Gai* does not disclose a policy engine that includes a verification clause or that is configured to verify a vendor-neutral configlet against the verification clause as is required by the claim. Applicants, accordingly, submit that claim 78 is distinguishable over *Gai*.

CONCLUSION

In view of the foregoing, Applicants respectfully submit that all of the rejections have been addressed and request that the rejections be withdrawn.

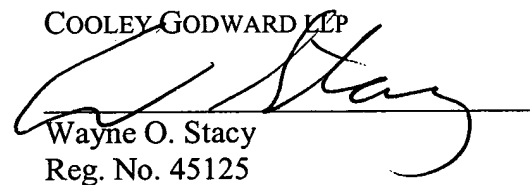
The Commissioner is hereby authorized to charge any appropriate fees under 37 C.F.R. §§1.16, 1.17, and 1.21 that may be required by this paper, and to credit any overpayment, to Deposit Account No. 50-1283.

COOLEY GODWARD LLP
 Attention: Patent Group
 One Freedom Square - Reston Town Center
 11951 Freedom Drive
 Reston, Virginia 20190-5601
 Tel: (720) 566-4125
 Fax: (720) 566-4099

Respectfully submitted,

COOLEY GODWARD LLP

By:


 Wayne O. Stacy
 Reg. No. 45125